

EXHIBIT L

1 SHOOK, HARDY & BACON LLP
2 B. Trent Webb, Esq. (*pro hac vice*)
3 Eric Buresh, Esq. (*pro hac vice*)
4 2555 Grand Boulevard
5 Kansas City, Missouri 64108-2613
6 Telephone: (816) 474-6550
7 Facsimile: (816) 421-5547
bwebb@shb.com
eburesh@shb.com

8 Robert H. Reckers, Esq. (*pro hac vice*)
9 600 Travis Street, Suite 1600
10 Houston, TX 77002
11 Telephone: (713) 227-8008
12 Facsimile: (731) 227-9508
13 rreckers@shb.com

14 GREENBERG TRAURIG
15 Mark G. Tratos, Esq. (NV Bar No. 1086)
16 Brandon Roos, Esq. (NV Bar No. 7888)
17 Leslie Godfrey, Esq. (NV Bar No. 10229)
18 3773 Howard Hughes Parkway 400 N
19 Las Vegas, NV 89169
20 Telephone: (702) 792-3773
21 Facsimile: (702) 792-9002
tratosm@gtlaw.com
roosb@gtlaw.com
godfreyl@gtlaw.com

22 WILSON SONSINI GOODRICH & ROSATI
23 Jonathan M. Jacobson, Esq.
24 1301 Avenue of the Americas, 40th Floor
25 New York, New York, 110019
26 Telephone: (212) 999-5800
27 Facsimile: (212) 999-5899
28 jjacobson@wsgr.com
(pro hac vice applications to be submitted)

29 Michael B. Levin, Esq.
30 650 Page Mill Road
31 Palo Alto, CA 94304-1050
32 Telephone: (650) 493-9300
33 Facsimile: (650) 493 - 6811
34 mlevin@wsgr.com
(pro hac vice application to be submitted)

35 *Attorneys for Defendants*
36 RIMINI STREET, INC. and SETH RAVIN

37
38 UNITED STATES DISTRICT COURT
39 DISTRICT OF NEVADA

40 ORACLE USA, INC., a Colorado corporation;
41 ORACLE AMERICA, INC. a Delaware
42 corporation; and ORACLE INTERNATIONAL
43 CORPORATION, a California corporation,

44 Plaintiffs,

45 v.

46 RIMINI STREET, INC., a Nevada corporation;
47 SETH RAVIN, an individual,

48 Defendants.

49 Case No. 2:10-cv-0106-LRH-PAL

50 DEFENDANT RIMINI
51 STREET INC.'S SECOND
52 SET OF REQUESTS FOR
53 PRODUCTION OF
54 DOCUMENTS TO
55 PLAINTIFFS

1 PROPOUNDING PARTY: Defendant Rimini Street, Inc.
2 RESPONDING PARTY: Plaintiffs Oracle USA, Inc., Oracle America, Inc., and
3 Oracle International Corporation
4 SET NO.: Two

5 **DEFENDANT RIMINI STREET INC.'S SECOND SET OF REQUESTS FOR**
6 **PRODUCTION TO PLAINTIFFS**

7 Pursuant to Federal Rule of Civil Procedure 34, Defendant Rimini Street Inc. ("Rimini
8 Street") requests that Plaintiffs Oracle USA, Inc. ("Oracle USA"), Oracle America, Inc. ("Oracle
9 America"), and Oracle International Corporation ("OIC") (together "Oracle" or "Plaintiffs")
10 produce for inspection and copying all of the following documents and other tangible things that
11 are in its possession, custody, or control. Production shall take place within 30 days of service of
12 this request, at the offices of Shook, Hardy & Bacon, LLP, 2555 Grand Boulevard, Kansas City,
13 Missouri 64108 or at such other location and time as the parties may agree. Oracle is subject to
14 a duty to supplement all responses to these requests for production in accordance with Federal
15 Rule of Civil Procedure 26(e). The following definitions and instructions apply.

17 **DEFINITIONS**

18 The following definitions shall apply throughout these requests, regardless of whether
19 upper or lower case letters are used:

20 A. The term "First Amended Complaint" refers to the "First Amended Complaint for
21 Damages and Injunctive Relief" filed by Oracle on the April 19, 2010 in this action.

23 B. The term "document" is used herein in its broadest sense under Fed. R. Civ. P. 34
24 and applicable case law, including without limitation, hard copies, electronic documents,
25 electronic or computerized data compilations, software, software images, or downloads.

1
2 **REQUEST NO. 21:** All documents relating to the purchase or transfer of any rights to the
3 copyrighted work at issue in this litigation, including without limitation any transfer agreements,
4 contracts, payments, receipts, or licensing agreements.
5
6

7 **REQUEST NO. 22:** A copy of each of the copyrighted work allegedly infringed by
8 Defendants.
9

10 **REQUEST NO. 23:** All documents relating to any legal or administrative proceedings
11 concerning any of the copyrighted works at issue in this litigation, including without limitation,
12 documents, pleadings, deposition transcripts, hearing transcripts, orders, settlement documents,
13 written discovery, expert reports, declarations, any supporting papers and documents offered or
14 admitted in such proceedings.
15
16

17 **REQUEST NO. 24:** All documents relating to any interest that any person has in any of the
18 copyrighted works or the present litigation and any communications between Oracle and any
19 person having such an interest.
20
21

22 **REQUEST NO. 25:** All logs or electronic records reflecting downloads by the Defendants of
23 Software and Support Materials from any Oracle Website.
24
25

26 **REQUEST NO. 26:** All documents relating to Oracle's contention that "[s]ometimes Rimini
27 Street will download hundreds or even thousands of Software and Support Materials at a time,
28 relating to entire families of software (e.g., PeopleSoft, JDE, or Siebel) that the customer does

REQUEST NO. 87: All documents supporting any of Oracle's claims or defenses in this action.

REQUEST NO. 88: All documents relating to your retention, destruction, and preservation policies and practices, including electronic document retention, destruction, and preservation policies and practices for all categories of documents responsive to any of these requests.

DATED: May 13, 2010 SHOOK, HARDY & BACON

SHOOK, HARDY & BACON

By: /s/ Robert H. Reckers
Robert H. Reckers, Esq.
Attorney for Defendants
Rimni Street, Inc. and Seth Ravin

CERTIFICATE OF SERVICE

I hereby certify that the foregoing First Set of Requests for Production to Plaintiff was served on the 13th day of May 2010, via email, as indicated below.

BOIES, SCHILLER & FLEXNER LLP
RICHARD J. POCKER (NV Bar No. 3568)
300 South Fourth Street, Suite 800
Las Vegas, NV 89101
Telephone: (702) 382-7300
Facsimile: (702) 382-2755
rpocker@bsflp.com

9 BOIES, SCHILLER & FLEXNER LLP
10 STEVEN C. HOLTZMAN (*pro hac vice*)
FRED NORTON (*pro hac vice*)
11 KIERAN P. RINGGENBERG (*pro hac
vice*)
12 1999 Harrison Street, Suite 900
Oakland, CA 94612
13 Telephone: (510) 874-1000
Facsimile: (510) 874-1460
14 sholtzman@bsflp.com
fnorton@bsflp.com
15 kringgenberg@bsflp.com

BINGHAM MCCUTCHEN LLP
GEOFFREY M. HOWARD (*pro hac vice*)
THOMAS S. HIXSON (*pro hac vice*)
KRISTEN A. PALUMBO (*pro hac vice*)
Three Embarcadero Center
San Francisco, CA 94111-4067
Telephone: 415.393.2000
Facsimile: 415.393.2286
geoff.howard@bingham.com
thomas.hixson@bingham.com
kristen.palumbo@bingham.com

DORIAN DALEY (*pro hac vice application
to be submitted*)
DEBORAH K. MILLER (*pro hac vice*)
JAMES C. MAROULIS (*pro hac vice*)
ORACLE CORPORATION (*pro hac vice*)
500 Oracle Parkway
M/S 5op7
Redwood City, CA 94070
Telephone: 650.506.4846
Facsimile: 650.506.7114
dorian.daley@oracle.com
deborah.miller@oracle.com
jim.maroulis@oracle.com

By: /s/ Robert H. Reckers
Robert H. Reckers, Esq.
Attorney for Defendants
Rimini Street, Inc. and Seth Ravin